

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE)	CHAPTER 13
)	
Scottie Lamar Cousins,)	CASE NO. 18-68840-JRS
)	
Debtor.)	
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IH6 Property Georgia, LP,)	
)	
Movant,)	
)	
vs.)	
)	
Scottie Lamar Cousins,)	
Debtor)	
)	
&)	
)	
Nancy J. Whaley,)	
Chapter 13 Trustee,)	
)	
Respondents.)	
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**DEBTOR'S RESPONSE TO MOVANT'S' MOTION TO LIFT STAY FOR
DEBTOR'S NONCOMPLIANCE WITH STRICT COMPLIANCE ORDER**

COMES NOW Scottie Lamar Cousins, Debtor in the above-styled case, by and through his attorneys, and files this Response to Movant's Motion to Lift Stay for Debtor's Noncompliance with Strict Compliance Order and respectfully shows the court the following:

1.

Movant sought relief from the automatic stay (Doc. 21) and the Court entered an Order Denying the Motion for Relief pursuant to terms reached by Movant and Debtor.

2.

Debtor has attempted to comply with the terms of his Chapter 13 Plan. He attempted to make two payments to IH6 and had one payment returned because it was not the correct amount as stated in the Order and another that has never been redeemed or returned.

3.

Debtor is ready, willing, and able to pay the fees related to the Order and only contests the late fees that have been added, as he has attempted to make payments.

WHEREFORE, Debtor respectfully requests that this Court deny the Motion and for such other relief as this Court deems just and proper.

This 9th day May, 2019.

Respectfully submitted,

/s/

Dan Saeger
Attorney for the Debtor
GA Bar No.: 680628
SAEGER & ASSOCIATES, LLC
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Dalton, GA 30720
(P) 706-529-5566
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CERTIFICATE OF SERVICE

I certify that true and correct copies this Motion have been served upon the following by placing same in an envelope with adequate First Class postage affixed and depositing same in the United States Mail addressed for delivery to:

Debtor
Scottie Lamar Cousins
P.O. Box 2236
Jonesboro, GA 30237

Chapter 13 Trustee
Nancy J. Whaley
303 Peachtree Center Ave., Ste 120
Atlanta, GA 30303

Attorney for the Movant
O'Kelley & Sorohan
Attn: Brandi Wade
2170 Satellite Blvd., Ste. 375
Duluth, GA 30097

This 9th day of May, 2019

/s/ _____
Dan Saeger
Attorney for the Debtor
GA Bar No.: 680628

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